

Buildout Increase under A-CAM is Significantly Greater than Under BLS

- “ As compared to their legacy build-out requirement:
 - “ Model electors must build about 500,000 more locations at speeds of 4/1 M or higher
 - “ 372,000 of these are 25/3 M locations
 - “ 273,000 of these are 10/1 M locations
- “ BLS, using the A-CAM cost method, only requires 174,000 10/1 M locations
- “ Companies with Legacy support greater than A-CAM support that elect the model (“model losers”) have a 25/3 M and 10/1 M buildout obligation two times greater than their 10/1 M obligation under BLS
- “ Eliminating companies with higher build-out percentages harms build-out numbers:
 - “ Between 80% and 90%: Model build-out 31,000 BLS 117
 - “ Between 70% and 80%: Model build-out 62,000 BLS 2,178





